UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

VANESSA MARTINEZ, et al.,)
)
Plaintiffs,)
i iaiitiiis,) Case No. 3:11-cv-1030
v.) CHIEF JUDGE HAYNES
LEE GAINES, et al.,)
Defendants.)

JOINT NOTICE OF COMPROMISE AND SETTLEMENT

Come now the parties, by and through their respective counsel, and hereby give notice to the Court that the parties have reached an agreement to compromise and settle all matters at issue in this litigation. A Settlement Agreement is being drafted which will incorporate all terms of the agreement, and following its review and consummation by the parties, an Agreed Order of Dismissal will be submitted within thirty (30) days.

Respectfully submitted,

JERRY E. MARTIN

United States Attorney Middle District of Tennessee

S. DELK KENNEDY Assistant United States Attorney

By: /s Michael L. Roden
MICHAEL L. RODEN (BPR 010595)
Assistant United States Attorneys
110 Ninth Avenue South, Suite A-961
Nashville, Tennessee 37203-3870
Telephone: 615/736-5151

Elliott Ozment (BPR 4331)
Tricia Herzfeld (BPR 26014)
/s R. Andrew Free
R. Andrew Free (BPR 30515)
OZMENT LAW
1214 Murfreesboro Pike
Nashville, TN 37217
(615) 321-8888
(615) 321-5230 (fax)
Elliott@ozmentlaw.com
tricia@ozmentlaw.com
afree@ozmentlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been electronically delivered via this Court's ECF/CM system on this date to the following recipients:

S. DELK KENNEDY, JR. Assistant United States Attorney 110 9th Avenue South, Suite A-961 Nashville, Tennessee 37203-3870

MICHAEL L. RODEN Assistant United States Attorney 110 9th Avenue South, Suite A-961 Nashville, Tennessee 37203-3870

Counsel for ICE Defendants

s/R. Andrew Free
R. Andrew Free BPR# 30513